OPERATING INSTRUCTION

Retrograding Hazardous Property Chapter II, page 6 (May 23, 2003)

RESPONSIBILITY Generating Activity	STEP 1	ACTION Contact the servicing DRMO (aka losing DRMO (LDRMO)) of property requiring turn-in. When there is no servicing DRMO available, the generating activity must: (a) For overseas locations within the DRMS-I Command contact DRMS Business Management Branch (DRMS-ILA*); (b) For all other overseas locations contact DRMS National Process Compliance Office (DRMS-NPC*); to notify of property requiring turn-in. (Reference: DoD 4160.21-M, Chapter 3, Para B).
LDRMO	2	If property cannot be disposed of or sold locally, contact DRMS-ILA or DRMS-NPC for the requirement to retrograde and the establishment of a point of contact for the retrograde shipment. Forward a copy of the DRMS Form 1944 to DRMS-ILA and/or DRMS-NPC. NOTE: If Losing DRMO is under the International Command, your POC is DRMS-ILA. If losing DRMO is under the National Command, your POC is DRMS-NPC.
Generating Activity/LDRMO	3	Coordinate with NPC to determine the gaining DRMO (GDRMO) in CONUS and appropriate disposal contract. Notify GDRMO and request NPC to provide appropriate CLIN listing to loosing DRMO (LDRMO) or generating activity, as appropriate.
DRMS-ILA/NPC	4	Ensure appropriate agreements or arrangements, in accordance with Basel Convention, Article 11, are in place prior to receiving hazardous waste and other wastes that are offered for retrograde to the U.S. for disposal.
ILA/NPC	5	Determine GDRMO that will coordinate the saleof hazardous property. Provide list of proposed property to NPC/GDRMO to determine if market exists for any/all items. The LDRMO can provide this list of proposed saleable items to GDRMO/NPC.

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LDRMO/ILA/NPC	6	Inform the generating activity of what funding documentation is required: (a) Military Interdepartmental Purchase Request (MIPR) for packing, crating, handling and ground transportation (PCH&T) requirements. (b) Transportation Authorization Code (TAC) for ocean transportation. (c) Funding document, two digit MILSBILLS fund code in card column 51 and 52 and DODDAC for disposal (or MIPR if MILSBILLS is not in place at installation).
Generating Activity	7	Prepare and provide funding documentation required for packaging, marking and labeling of property to LDRMO for turn-in in accordance with appropriate instructions and applicable DoD/host country/international laws and regulations. (Reference: DoD 4160.21-M) NOTE: If using a DD Form 1348-1A, the generating activity must have a proper DoDAAC and MILSBILLS fund code.
LDRMO	8	Inspect hazardous property to be turned-in; review generating activity Disposal Turn-In Document (DTID) information and ensure any analysis, MSDS and supporting documentation matches DD Form 1348-1As; determine that the generating activity has an accepted MIPR on file with sufficient available balance to cover estimated PCH&T. (If no previous history, PCH&T cost to be determined by coordination with the losing Transportation Management Office (LTMO)). (Reference: DRMS-I 4160.14, Volume II, Chapter 2, Section 1, Paragraph L). **NOTE** (a) Items shall be marked with the DTID and piece count (i.e. 1 of 1, 2 of 5, etc.). (b) A representative/government representative (i.e. DRMS contractor) of the GDRMO should be the first choice for performing all pre-inspection duties for sites where there is no servicing LDRMO. If special circumstances arise that indicate someone other than the GDRMO might be more appropriate, these will be evaluated by DRMS-ILA/NPC on a case-by-case basis.
LDRMO	9	Accept property. Post estimated disposal costs for items scheduled for sale.

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LDRMO/ILA/NPC	10	Contact GDRMO to determine if any special permits or notifications (other than shipping notifications) are necessary for entry to CONUS or another country (Department of Agriculture permits/forms are required for movement of untreated soil; mine anchor cables, Canadian notifications, etc.) (Depending on location of GDRMO; DRMS-I FST PACIFIC, DRMS-ILA or DRMS-NPC will be consulted on required notifications.) NOTE: Mine anchor cables is a RCRA/TSCA waste which require a LDR for D009. (This may change if the Navy has done away with all the old stuff they had in storage).
LDRMO	11	Complete inventory summary using CLIN price list provided. Ensure units of issue and prices match CLIN list, and ensure that inventory matches DD Form 1348-1As. (If property is to be offered for sale, the DD Form 1348-1A should contain the appropriate CLIN and funding DoDAAC if sales attempt fails). <i>NOTE:</i> Accurate, detailed inventories and DD Form 1348-1As are essential for successful retrogrades.
LDRMO	12	Complete Retrograde Checklist and submit a signed copy and the Inventory Summary Sheets to DRMS-ILA or DRMS-NPC to obtain a retrograde number.
DRMS-I-FST PACIFIC/ILA/NPC	13	Perform review of completed retrograde documentation to insure that all items are eligible for disposal or sale via retrograde. Provide a retrograde number for shipments from OCONUS.
LDRMO	14	Prepare DTIDs to transfer accountability from LDRMO to GDRMO. Suffix original DTID number with "R". Annotate blocks FF and GG with the CLIN and cost. File one copy, provide one copy to the LTMO, if it is required, and attach remaining copies to the Inventory Summary Sheet. Submit Retrograde Checklist, completed typewritten Inventory Summary Sheets, annotated copies of the original DTID, issue (transfer) DTIDs, laboratory analyses, hazardous waste profile sheets (HWPS), Land Disposal Restriction notifications (LDRs), as applicable, to the GDRMO or DRMSI-ILA (dependent on location of GDRMO).
	15	Enter delivery order request information into BOSS. Identify problems with BOSS to DRMS-ILA or DRMS-NPC.
GDRMO	16	Receive/review documentation. Setup folder and conduct technical review. Conduct administrative review to include the following: (a) Ensure all DD Form 1348-1As are received.

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DRWS-1 6030.1		(b) Ensure information on DD Form 1348-1As and supporting documentation match.
	17	Review retrograde package. Advise LDRMO, DRMS-ILA or DRMS-NPC of any problems or changes, including any contract modifications required. Obtain USEPA identification number from DRMS-NPC to be used for manifesting hazardous waste shipments.
DRMS Contracting	18	Negotiate/modify disposal contracts as needed. Issue delivery order to contractor, with copies to GDRMO and LDRMO. Ensure copies of any contracting modifications are provided to LDRMO and GDRMO. NOTE: GDRMO to notify Contracting Office that copies of the delivery order and any modifications must be provided to the LDRMO.
LDRMO	19	Match inventory with delivery order. Identify any discrepancies to GDRMO, ILA and Contracting Officer. (This would only apply to a LDRMO without the BOSS capability. (Note: Japan (Sagami and Okinawa) can do their own BOSS input to create a delivery order.)
	20	Request PC & H costs from LTMO. NOTE: If already accomplished, initiate shipping request through Ocean Cargo Booking Office (OCBO). Once property is packaged for shipment, initiate shipping request through OCBO. Provide final dimensions and weights to GDRMO. Ensure outside packagings are marked or stenciled with the following information: D.O. # L. I L. I. Piece Count Manifest # (as applicable)
GDRMO	21	Provide final dimensions and weights to disposal contractor for preparation of manifests. *NOTE*: Once the LDRMO has turned in the property to OCBO/TMO, access to the property may not be possible.
LDRMO	22	Receive tentative pick-up date, vessel name, sail date, port of arrival, and estimated date of arrival from LTMO.

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	23	Send e-mail to DRMS-ILA, DRMS-I FST Pacific, or DRMS-NPC and GDRMO with tentative shipping schedules. Revise as necessary. (Coordinate MTMC POC(s) with LDRMO. The information of tracking the ship movement should not only come from the LDRMO).
GDRMO	24	Receive shipping information and provide schedule/timeframes to port of arrival and the disposal contractor or the TMO (if not being offered for sale). Provide authorization to ship to LDRMO (with a copy provided to DRMS-NPC and ILA) once the signed delivery order has been received and notifications have been made.
LDRMO	25	Obtain Transport Control and Management Documents (TCMD) and verify final destination. Obtain LTMO packing inventory and/or the Dangerous Cargo Manifest that cross-references MILVANs of packed inventory to items by DTID, as appropriate. Provide copies to GDRMO. This information should be sent via expedite mail service, i.e., Federal Express or UPS.
	26	When notified of the impending arrival of the ship, coordinate ground transportation to get the retrograde items to the port and verify all items on the retrograde are sent.
	27	Once the ship is underway, send e-mail to the GDRMO, DRMS-ILA and DRMS-NPC with the vessel name, voyage number, departure date, estimated arrival date, port of arrival, and any discrepancies.
	28	Receive outbound PC & H costs from LTMO, and adjust spreadsheets as required.
GDRMO	29	Coordinate with disposal contractor or local TMO (for sales) to arrange ground transportation to remove property from the Port of Arrival.
	30	Meet retrograde at port and coordinate movement from vessel to disposal contractor or DRMO. Use packing inventory and/or delivery order to cross reference containers to DTIDs. If a transport discrepancy is noted, contact the pier, DRMS-NPC or DRMS-ILA and the contracting officer (for items requiring disposal). Assure retrograde is properly manifested and loaded onto disposal contractor or TMO conveyance. DRMO/COR representative will ensure all permits/forms & approved notifications are provided to transporter prior to departure.

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	31	Once the contractor has removed the property or the property has been delivered to the DRMO, send e-mail to DRMS-NPC or DRMS-ILA and the LDRMO to inform them of the departure or receipt of the property for sale.
LDRMO	32	Process retrograde records removal in DAISY.
LDRMO/DRMS-NPC or DRMS-ILA	33	Maintain a PCB log and record of manifests. Monitor date of shipment, ensuring "come back" manifests are received within the timeframes prescribed in 40 CFR. NOTE: If the LDRMO initiates the delivery order, then they can also do the BOSS PMF – providing that the LDRMO OCONUS gets the "come back" copy in a timely manner.
GDRMO	34	Perform DAISY input for retrograde records and for disposal and sales actions. *NOTE: GDRMO shouldn't have to input to DAISY/BOSS as it appears the LDRMO will have accomplished this by the end of step #15. If the LDRMO has the BOSS capability, then the GDRMO/DRMS-NPC or DRMS-ILA would only perform the BOSS PMF.
	35	Provide collection summary report of retrograde, COR report, manifests, continuation pages and supplementary sheets, and LDR notification to LDRMO (the COR checklist may be used for this purpose if all applicable information is contained therein).
	36	Prepare sales catalog, conduct sale. Advise LDRMO of sales success. Provide the sales number to the LDRMO.
LDRMO	37	Inform Generating Activity of final cost for disposal for items that failed sale. Inform Generating Activity disposal funding that can be deobligated due to successful sale.
Generating Activity	38	Deobligate funds committed for the disposal of items that were sold.
DRMS Contracting	39	For retrogrades from overseas, forward copies of certificates of disposal to LDRMO.
GDRMO/DRMS Contracting	40	Provide copies of all completed manifests to LDRMO.

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RETROGRADE CERTIFICATION CHECKLIST

Chapter II, page 6 (August 22, 2000)

1.	Type of Property Requiring Retrograde.				
2.	Property Turned-In to the DRMO?	YES	NO	N/A	INITIAL /DATE
a.	Properly packaged for international shipment?				
b.	Properly marked for international shipment?				
c.	Properly labeled for international shipment?				
3.	Received all Required Turn-In Documentation?	YES	NO	N/A	INITIAL /DATE
a.	DD Form 1348-1A with MILSBILLS fund code (for disposal).				, DILLE
b.	Proper DoDAAC used.				
c.	HWPS.				
d.	Laboratory Analyses.				
e.	MSDS.				
4.	Funding Documentation Received from Generator?	YES	NO	N/A	INITIAL /DATE
a.	Military Interdepartmental Purchase Request (MIPR) for packing,				
	crating, handling, and ground transportation (PCH&T) requirements?			ı	·
b.	Transportation Authorization Code (TAC) for ocean transportation?				
c.	Funding Document or DoDAAC?				
5.	All Items Marked with the Disposal Turn-In Document Number (DTID)?	YES	NO	N/A	INITIAL /DATE
		YES	NO	N/A	INITIAL /DATE
6.	Disposal Contract Required Modification?				
a.	Contract modified?				
7.	Inventory Summary Using Current CLIN Price List Completed?	YES	NO	N/A	INITIAL /DATE

RETROGRADE CERTIFICATION CHECKLIST

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8.	Inventory Matches DD Form 1348-1A?	YES	NO	N/A	INITIAL /DATE
a.	DoDAAC				/BIIIE
b.	Quantity				
c.	CLIN				
d.	Proper Shipping Name				
e.	PPM of PCBs Listed				
f.	Country of Manufacturer Identified				
g.	Units of Issue and Prices Match CLIN List				
Ü					
9.	Contacted LDRMO to determine needs for special permits or notifications? (Department of Agriculture Permits for Soil, etc.)?	YES	NO	N/A	INITIAL /DATE
10.	Completed everything required on this retrograde checklist and on	YES	NO	N/A	INITIAL
	Retrograde SOP?		- 1 -	- "	/DATE
11.	Complete signed Retrograde Certification Checklist packed with Inventory Summary Sheets sent to DRMSI-H?	YES	NO	N/A	INITIAL /DATE
12.					
	Signature of LDRMO Env. Branch Chief Date				
13.	Review inventory list and Retrograde Certification Checklist to insure all items are eligible for disposal via retrograde?	YES	NO	N/A	INITIAL /DATE
14.	Provided Technical Review of: Inventory list, Retrograde Certification Checklist to insure all items are eligible for disposal or sale via	YES	NO	N/A	INITIAL /DATE
	retrograde? (this step applicable to Shipments to Asia only and not Europe).				
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RETROGRADE CERTIFICATION CHECKLIST

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15.	Signature of DRMSI-H Env. Program Mgr (Europe and Asia/Pacific as Appropriate)	Date
16.	Retrograde Number: (Number is assigned by DRMSI-H Environmental Pror Asia/Pacific as appropriate)	rogram Manager in Europe